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## 5 [Proposed] Liaison Counsel

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**ROBERT LOWINGER, on Behalf of  
Himself and All Others Similarly Situated,**

CASE NO. 2:09-cv-1558-RCJ-LRL

## CLASS ACTION

Plaintiff,

MGM MIRAGE, J. TERENCE LANNI,  
JAMES J. MURREN, DANIEL J.  
D'ARRIGO, and ROBERT H. BALDWIN,

## Defendants.

**KHACHATUR HOVHANNISYAN,  
Individually and On Behalf of All Others  
Similarly Situated,**

Case 2:09-cv-2011-LRH-RJJ

## **CLASS ACTION**

Plaintiff,

VS.

MGM MIRAGE, J. TERENCE LANNI,  
JAMES J. MURREN, DANIEL J.  
D'ARRIGO, and ROBERT H. BALDWIN,

## Defendants.

**JAMES VIDRINE'S MOTION FOR CONSOLIDATION AND FOR APPOINTMENT OF  
LEAD PLAINTIFF AND APPROVING HIS SELECTION OF PLAINTIFFS' CO-LEAD  
COUNSEL AND PLAINTIFFS' LIAISON COUNSEL**

1 PLEASE TAKE NOTICE that class member, James Vidrine ("Movant"), by his  
2 counsel, hereby moves this Court for an Order (attached hereto as Exhibit A): (i)  
3 consolidating the above-captioned actions (the "Related Actions") pursuant to Fed. R. Civ.  
4 P. 42(a); (ii) appointing him as Lead Plaintiff in this action pursuant to §21D(a)(3)(B) of the  
5 Securities Exchange Act of 1934 and 15 U.S.C. §78u-4(a); (iii) approving his choice of The  
6 Brualdi Law Firm, P.C. and Weiss & Lurie as Plaintiffs' Co-Lead Counsel, and Lee Drizin  
7 as Plaintiffs' Liaison Counsel and (iv) granting such other and further relief as the Court  
8 may deem just and proper.

9 This motion is made on the grounds that (1) the Related Actions involve common  
10 questions of law and fact and consolidation would avoid unnecessary delay; and (2)  
11 Movant is the "most adequate plaintiff" pursuant to the Exchange Act. See 15 U.S.C.  
12 §78u-4(a)(3)(B). In addition, Movant meets the requirements of Fed. R. Civ. P. 23(a)  
13 because his claims are typical of the class members' claims and because he will fairly and  
14 adequately represent the class. Further, Movant has selected and retained counsel with  
15 substantial experience in prosecuting securities fraud class actions to serve as Counsel.

16 In support of this Motion, Movant submits herewith a Memorandum of Law in  
17 Support and Declaration of Lee Drizin.

18  
19 Dated: October 19, 2009 LEE A. DRIZIN, CHTD.

20 By /s/ Lee A. Drizin  
21 Lee A. Drizin

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